



## CITY of NORFOLK

Office of the Mayor

Paul D. Fraim  
Mayor

January 31, 2013

Gregory A. Whirley  
Transportation Commissioner  
Virginia Department of Transportation  
1401 East Broad Street  
Richmond, VA 23219

Re: I-64 Hampton Roads Bridge Tunnel Draft Environmental Impact Statement  
State Project: 0064-965-004, P101; UPC 99037

Dear Commissioner Whirley:

The City of Norfolk hereby forwards and submits its formal comments on the Draft Environmental Impact Statement (DEIS) for the I-64 Hampton Roads Bridge Tunnel (HRBT) corridor between the cities of Hampton and Norfolk. The City of Norfolk strongly opposes all build options for expanding the HRBT that are included in the draft document. Instead, Norfolk continues to support the long standing and broad regional consensus in place since 1997 favoring the Patriots /Third Crossing as the superior option for improving connectivity between Southside Hampton Roads and the Peninsula. Towards this end, Norfolk City Council in December 2008 unanimously passed a resolution opposing any expansion of the HRBT corridor (copy attached), and the City's new draft General Plan, *planNorfolk2030*, which is scheduled to be adopted by City Council in March 2013, also reflects the priority placed on Patriots /Third Crossing as the preferred strategy for addressing future Hampton Roads crossing capacity and congestion issues.

We believe the new DEIS document for the Hampton Roads Bridge Tunnel together with the recently updated Environmental Assessment for the Patriots Crossing together serve to underscore and strengthen the case for the Patriots/Third Crossing corridor, validating past regional decisions and selections. In brief, the current documents clearly detail that any expansion of the HRBT is an inferior regional transportation solution in comparison to the Patriots/Third Crossing and that has far greater environmental and community impacts while also failing to create new connections supporting regional economic growth. The main points supporting these conclusions are summarized individually below.

1. Regional Transportation Network Benefits – The utility of the new HRBT analysis is severely limited by the early decision in the process to focus solely on improvement options to the existing corridor. Failing to consider alternative options to improve travel and connections between the Southside and Peninsula regions was noted as a deficiency in the City's February 2012 letter commenting on the Draft Purpose and Need for the HRBT study (copy attached). For the levels of investment required to develop a new crossing of Hampton Roads, the question must always be what is the region's best option and not just what are potentially viable options. Unfortunately, that is not the case with the current DEIS document.

The original Third Crossing analysis, unburdened by such a narrow focus, examined a full range of potential crossing options and determined that the Third Crossing corridor would generate and support five times the level of future crossing activity than a widened HRBT, showing that the proposed new location would better link key facilities and institutions in the region. More recently, the Patriots Crossing Environmental Assessment in 2012 confirmed that the Patriots Crossing segment alone would reduce Hampton Roads Bridge Tunnel (HRBT) traffic in 2018 by 12% over no build conditions, fully in line with the stated goal in the original study to reduce projected HRBT volumes by at least 10% over no build conditions.

Even further though, the total regional transportation network benefits of the Patriots Crossing link extend far beyond just the HRBT link. The new re-evaluation states that the Patriots Crossing would provide for 235 minutes of peak hour travel time savings in 2018 using 10 key origins and destinations. These findings represent an improvement from 174 minutes of travel time savings for the full new crossing in the original analysis. The findings are also fully in line with the results of an analysis requested and funded by the Virginia General Assembly and conducted by the Virginia Modeling, Analysis and Simulation Center analysis which identified the Patriots Crossing as having the greatest total enhancement to regional travel of any single proposed transportation improvement in Hampton Roads. The Patriots/Third Crossing is clearly the better total transportation solution for improving connectivity across Hampton Roads.

2. Economic Connections and Linkages – The expenditure of billions of dollars for a new transportation facility must do more than just pour concrete. These types of major projects should also support regional goals by creating new strategic economic growth opportunities and connections in addition to their transportation benefits. The Patriots/Third Crossing corridor directly ties to the Norfolk Naval Base, the largest employment center in the region and also links the port facilities throughout Hampton Roads which are an economic driver and engine not just for the region but also for the Commonwealth of Virginia as a whole. At present, military personnel represent 20% of total regional employment, with Department of Defense expenditures in Hampton Roads having grown from \$4.67 billion to \$13.5 billion between 2001 and 2010. Similarly, the Port of Virginia in 1995 supported 120,000 jobs in Virginia with a total payroll of \$3 billion. In 2010, the Port generated 343,000 jobs, \$13.5 billion in employee compensation and \$41 billion in total revenue for Virginia. A widened

HRBT, by failing to create any connections and linkages to these major regional economic facilities, suffers badly in comparison.

3. Environmental and Community Impacts – Widening the HRBT corridor would be devastating to neighborhoods, community facilities, and sensitive historic and environmental properties in Norfolk. I must emphasize that the word devastating is used deliberately here and is not an overstatement. The DEIS paints a grim litany of destruction across major parts of the northwest part of the City – up to 150 acres of land impacted, between 150 and 185 residential displacements, another 700 homes noise impacted, 50+ acres of wetlands affected, and seven park and recreation facilities impacted. The total acquisition value for properties impacted in Norfolk is estimated at between \$74.3M and \$82.5M, representing a property tax loss to the City of approximately \$822,000 -- \$909,000 annually. It is recognized that needed public infrastructure and improvement projects will sometimes necessarily impact private property. However, having a superior transportation alternative available – the Patriots/Third Crossing – with far lower and more manageable environmental and community impacts makes the level disruption related to an expanded HRBT unsupportable on every level.
4. Multimodal Option – Any new crossing of Hampton Roads represents a 50-100 year investment in the region, so we should be building facilities not just for current travel demands and patterns but also for future needs. With the recent opening and success of the TIDE light rail system in Norfolk, Hampton Roads is moving to a more balanced transportation network. The City of Virginia Beach is actively pursuing an extension of light rail in that city and new studies of options to extend the existing TIDE light rail system north to the Norfolk Naval Base are now being initiated. The City of Newport News has in the past also developed concepts for light rail transit for portions of their community. Therefore, no new full transportation connection between the Southside and Peninsula in Hampton Roads should be considered without inclusion of a multimodal component to provide an option to link these systems as they come online. Such a connection has been an integral part of the Third Crossing proposal since its inception, while no such similar link is included any of the HRBT concepts given its remoteness from the densities in employment that would support an investment in fixed guideway transit.
5. Transportation System Options and Redundancy – In addition to the strong reasons detailed above supporting advancement of the Patriots/Third Crossing as the region's priority over a widened HRBT, the development of a new crossing corridor would have other transportation and network benefits. Specifically, by not placing all of our crossing eggs in one basket through the development of a new crossing corridor, opportunities to better balance and shift traffic between facilities in reaction to major incidents and construction and maintenance activities will be created. The famous "Carmageddon" incident in July 2009 which strangled traffic all across Hampton Roads resulted from a break in an eight inch water pipe in the HRBT. This type of incident would have flooded and blocked four lanes in a new tunnel as efficiently as it blocked the existing two lanes making the entire crossing impassible with no easy alternative option available.

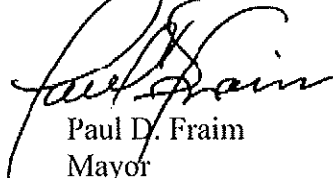
Developing the Patriots/Third Crossing corridor would allow for better balancing of traffic in response to major incidents and not leave significant portions of the region vulnerable and dependent on just one principal option as is the case today. The need for multiple corridors is especially critical related to hurricane evacuation and other emergency situations. Also, it is clear that a plan for the long term rehabilitation of the existing, aging HRBT infrastructure to maintain this critical connection within the regional network is appropriate. However, managing such a major project requiring multiple and ongoing lane closures and shutdowns absent an available and convenient alternative corridor would make such a project almost impossible to manage. Just trying to pave one tube at the HRBT over a weekend this past summer led to hours long delays and frustration for regional travelers. Clearly, the region will be far better served having multiple crossing options available.

6. I-564 Intermodal Connector - In December 2012, Secretary of Transportation Sean Connaughton stated that, "extending and realigning I-564 will provide the starting point for a future crossing under the Elizabeth River to Interstate 664. The Commonwealth and VDOT worked extensively with the Navy, the City of Norfolk and the Virginia Port Authority so that this partnership and the resulting transportation improvements will benefit all parties involved. A smooth-flowing transportation network is of utmost importance to the security and economy of this region and the nation." The City of Norfolk could not agree more.

The I-564 Intermodal Connector is in fact the "Phase One" segment of the Patriots / Third Crossing. In December 2012, VDOT and the U.S. Navy signed a Memorandum of Agreement that will allow work to begin on the grounds of Naval Station Norfolk this year for the I-564 Intermodal project. The estimated cost of the I-564 extension project is \$169 million and funding has been approved. VDOT already has conducted preliminary engineering, environmental work, right-of-way acquisition, utility design and relocation and other activities for this design-build project. Extending I-564 to connect with I-664 with a future crossing will smartly build on this recent corridor investment.

In closing, again, the City of Norfolk strongly opposes all build options for expanding the HRBT that are included in the draft document. Instead, Norfolk continues to support the Patriots /Third Crossing as the superior option for improving connectivity between Southside Hampton Roads and the Peninsula.

Sincerely,



Paul D. Fraim  
Mayor

HRBT Project Manager

January 31, 2013

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cc: Governor Robert F. McDonnell  
Sean T. Connaughton, Secretary of Transportation  
Norfolk City Council  
Hampton Roads Congressional Delegation  
Hampton Roads General Assembly Delegation  
Commonwealth Transportation Board  
Hampton Roads Transportation Planning Organization  
Hampton Roads Mayors & Chairs Caucus  
Virginia Maritime Association  
Commander, Navy Region Mid-Atlantic  
Mr. Thomas Heil, HRBT Project Manager